

Thu, Jun 19, 2003

File No: 31-380.10B

EPA Docket Center (6102T)
1200 Pennsylvania Avenue, NW.
Washington, DC 20460

Attention Docket ID No. OAR-2002-0053

Ladies and Gentlemen:

Direct Final Rule Amendments
to Standards of Performance for Stationary Gas Turbines

The Los Angeles County Sanitation Districts (LACSD) is a confederation of independent special districts serving the wastewater and solid waste management needs of about 5.3 million people in Los Angeles County. Our service area covers approximately 810 square miles and encompasses 78 cities and unincorporated territory within the County. LACSD operates three gas turbines subject to subpart GG, that utilize digester gas produced from anaerobic digestion of sewage biosolids. We welcome the proposed amendments to update the testing and monitoring provisions, and to harmonize subpart GG with other federal regulations for stationary gas turbines. The proposed amendments, however, fail to harmonize subpart GG with local regulations, which usually impose much more stringent emissions limits and monitoring/reporting requirements than subpart GG.

The case in point is Rule 1134 of the South Coast Air Quality Management District (SCAQMD). This rule imposes a 25 ppm NO_x limit for digester gas fired turbines and requires a NO_x CEMS to take, at a minimum, one measurement each minute and average them over 15 consecutive minutes, and to submit monthly reports. In comparison, subpart GG imposes a 150 ppm NO_x limit and requires a CEMS to take at least one measurement every 15 minute period and calculate hourly averages, and to submit quarterly or semi-annual reports. Although compliance with Rule 1134 obviously surpasses all subpart GG requirements, subpart GG adds unnecessary paperwork including hourly averaging and quarterly or semi-annual reporting. Also, SCAQMD Rule 430 imposes a fuel sulfur limit for digester gas of 40 ppm(v) as H₂S determined by SCAQMD Method 307-91 while subpart GG limits fuel sulfur content to 0.8 percent by weight determined by specified ASTM methods. Again, compliance with Rule 430 obviously satisfies the sulfur limit of subpart GG, but subpart GG requires additional fuel sulfur analysis using an ASTM method.

As described above, the conflicting and duplicative requirements by federal and local regulations impose an unnecessary burden to sources. LACSD recommends an exemption provision be added to subpart GG to account for increased local rule stringency. We suggest the following:

Any gas turbines that are subject to SIP-approved, federally enforceable local regulations requiring more stringent NOx and/or sulfur limits shall be exempted from corresponding provisions of this subpart including testing, monitoring and reporting requirements?

LACSD appreciates the opportunity to comment on the proposed amendments. If we can clarify anything further, please call Dr. Seong Min of this office at (562) 699-7411 ext. 2116.

Yours very truly,

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